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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

1/24/02

OPP OFFICIAL RECORD
HEALTH EFFECTS DIVISION
SCIENTIFIC DATA REVIEWS
EPA SERIES 361

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: PP#:9F05092; Imazapic in/on Grass Pasture and Rangeland; Request for Waiver of 28-Day Subchronic Inhalation Toxicity Study

Tox.Chem No.:128943
MRID No.:None
DP Barcode No.:D279579
Submission No.:S607092

TO: Jim Tompkins, PM# 25
Herbicide Branch
Registration Division (7505C)

William Dykstra 1/24/02

FROM: William Dykstra, Ph.D., Toxicologist
Team II, RAB1
Health Effects Division (7509C)

THRU: G. Jeffrey Herndon, Branch Senior Scientist
Registration Action Branch I
Health Effects Division (7509C)

ACTION REQUESTED: The HED risk assessment for imazapic (Plateau) required that the Registrant, BASF, submit a 28-day inhalation toxicity study with the technical material which would provide a basis for determining more reliable route-specific Margins of Exposure (MOEs) for worker inhalation risks rather than the less reliable route-to-route MOE calculations currently being used. In response to this requirement of the risk assessment, BASF is requesting a waiver of this inhalation study on the basis of additional scientific rationales.

CONCLUSIONS: The requested waiver can be toxicologically supported based on the following considerations.